UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
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Explanation of Significant Differences

Stringfellow Acid Pits Superfund Site
3490 Pyrite Street
Glen Avon, California

I. Introduction

This document presents the explanation of significant differences (ESD) for a proposed change to the remedy chosen in the second Record of Decision (ROD2) for the Stringfellow Superfund site (the "Site"). ROD2, dated July 18, 1984, addressed the installation of an on-site pretreatment system for contaminated groundwater resulting from past activities at the Site.

The Site is located at 3490 Pyrite Street in Glen Avon, California. The primary agencies with responsibility for the Site are the United States Environmental Protection Agency, Region IX (US EPA), and the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) located in Sacramento, California. DTSC is the lead agency for the project proposed in this ESD.

Preparation and public notice of this ESD is required pursuant to section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. section 9617 (c). This ESD will become part of the administrative record (the "Administrative Record") for the Site. The Administrative Record is available for review in several repositories including the Riverside Public Library, 3581 Mission Inn Avenue, Riverside, California, and the Glen Avon Branch Library, Stringfellow Information Center, 9244 Galena Street, Glen Avon, California during normal library hours.

Currently, contaminated groundwater is being extracted from a series of wells located in the original disposal area of the Site and in downgradient, contaminated zones just to the south. The extracted groundwater is pumped to the on-site Stringfellow pretreatment plant (the "PTP") where the water is treated to remove site contaminants. The treated water from the PTP is then transported by tanker truck and discharged into the regional wastewater collection system, commonly known as the Santa Ana Regional Interceptor (SARI), that serves the upper Santa Ana River watershed area.

Since the time ROD2 was completed, the SARI has been extended and now passes within 1.5 miles of the Stringfellow PTP. DTSC has proposed constructing a pipeline to make a direct

connection between the PTP and the SARI. A direct pipeline to the SARI line would eliminate the tanker truck trips on the regional highways and municipal streets, and result in a significant reduction in operating costs of the Stringfellow PTP.

II. Background

The Stringfellow Site consists of a 17-acre area at the head of Pyrite Canyon in the Jurupa Mountains in western Riverside County, California. The Site was operated by the Stringfellow Quarry Company as a bulk liquid disposal facility from August 21, 1956 to November 19, 1972. During that period, approximately 34 million gallons of industrial wastes including acids, solvents, pesticides, and heavy metals were disposed of in unlined evaporation ponds. Metals and organic compounds have percolated into the underlying groundwater aquifer, and the contaminant plume has migrated from the Site.

In 1982, the Site was placed on the National Priorities List for remedial action under CERCLA. In September 1983, a "Fast-Track" Remedial Investigation/Feasibility Study was initiated, and in ROD2, US EPA decided that a pretreatment plant be constructed to treat extracted groundwater followed by discharge to a Publicly Owned Treatment Works (POTW). Construction of the PTP was completed in December 1985, with full operation in February 1986. The US EPA operated the PTP from 1986 until June 1996 when DTSC took over operational control.

The objective of the Stringfellow PTP and groundwater extraction system at the Site is to collect and remove contamination from three groundwater influent sources: Zone 1 (the historic waste disposal areas), Zone 2 (the mid-canyon extraction system), and Zone 3 (the lower canyon extraction system just north of Highway 60). Zone 1 flows (Stream A) receive pH adjustment, heavy metal removal, and filtration polishing treatment before being combined with Zone 2 flows (Stream B) and Zone 3 flows (Stream C) for organic treatment in the activated carbon system. Treated effluent from the PTP is then transported and discharged into the SARI interceptor. Currently, treated PTP effluent is trucked to a SARI collection point in the city of Corona, approximately 20 miles southwest of the Site along Interstate 15. Approximately 20 trucks per day, 6 days per week, are required to transport the effluent. The Santa Ana Watershed Project Authority (SAWPA), issues and enforces the waste discharge permit for the discharge of PTP effluent into the SARI. After discharge into the SARI, the PTP effluent, along with flows from other industrial wastewater dischargers, is then conveyed to the main County Sanitation Districts of Orange County (CSDOC) treatment facilities in Fountain Valley where the commingled wastewater receives additional treatment prior to being discharged into the Pacific Ocean through an ocean outfall.

III. Discussion of Differences

When the PTP was originally being planned, consideration was given to installing a pipeline to connect the PTP directly to the SARI line. However, this option was rejected in favor

of the current method of trucking the treated water to a SARI disposal point. This decision was based in large part on the high cost involved in constructing a pipeline to the SARI line which was then about 15 miles away. Since that time, the SARI line has been extended through the Glen Avon area and is now within 1.5 miles of the PTP. Due to the significant reduction in the distance to the SARI line, DTSC reevaluated the cost analysis of the options for transporting PTP effluent to the SARI line. The revised cost analysis indicated that the construction of the pipeline was now cost effective and would result in a substantial reduction in the annual operating costs of the Stringfellow PTP. Given that the PTP will be in operation for many years into the future, these annual cost savings would result in a significant reduction in the future cost of PTP operation. In addition to the operational and cost benefits of a direct pipeline connection to the SARI, the planned PTP pipeline would eliminate approximately 5000 tanker truck trips per year along regional highways and municipal streets.

IV. Public and Support Agency Comments

DTSC has carried out a substantial public outreach effort on this project. On November 7, 1997, DTSC published a Negative Declaration on the proposal pursuant to its responsibilities under the California Environmental Quality Act (CEQA). In addition, two public meetings were conducted to discuss the project in November 1997. Comments were received from two local agencies and from the Community Technical Advisor. DTSC addressed the concerns posed in these comments in their response to comments dated December 22, 1997. Many of the potential construction related impacts on the local community were considered during project planning. These issues were appropriately addressed by incorporating specific measures into the construction plan to minimize such impacts. Based on the DTSC initial study and the comments received, DTSC determined that the project would not have a significant effect on the environment.

EPA contacted DTSC, the RWQCB, and the Community Technical Advisor to discuss the proposed ESD prior to distribution of the draft. Neither agency nor the Community Technical Advisor expressed concern with the proposed change to the selected remedy as presented in the ESD. Both agencies and the Community Technical Advisor were sent draft copies of the ESD for comment in June 1998 and expressed support for the ESD as described above.

V. Affirmation of the Statutory Determinations

It is the determination of US EPA and DTSC that this modified remedy continues to satisfy the statutory requirements of cleanup under the Superfund process. Considering both the information that has been developed during the implementation of the remedy and the proposed changes to the selected remedy, EPA and DTSC believe that the remedy will remain protective of human health an the environment, will comply with Federal and State requirements that are applicable or relevant and appropriate to this remedial action, and will be cost effective.

VI. Availability of Administrative Record

The Administrative Record for this Site is available for review and comment by any member of the public at the locations mentioned above.

DECLARATION

The selected remedy is protective of human health and the environment, attains federal and state requirements that are applicable or relevant and appropriate to the remedial action , and is cost effective. This remedy satisfies the statutory preference for remedies that reduce toxicity, mobility and/or volume as a principal element. It also uses permanent solutions to the maximum extent practicable.

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Date

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